DRAFT

SITE ASSESSMENT REPORT FOR ESI ENVIRONMENTAL, INC. SITE ASSESSMENT INDIANAPOLIS, MARION COUNTY, INDIANA

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Emergency Response Branch Region V 77 West Jackson Boulevard Chicago, Illinois 60604-3507

Prepared by:

WESTON SOLUTIONS, INC.

20 North Wacker Drive, Suite 1210 Chicago, Illinois 60606

Date Prepared September 29, 2010

TDD Number S05-0001-1008-022

Document Control Number 1184-2A-AHYY

Contract Number EP-S5-06-04

WESTON START Project Manager Rick Mehl

Telephone Number 312-424-3312

U.S. EPA On-Scene Coordinator Verneta Simon

SITE ASSESSMENT REPORT FOR ESI ENVIRONMENTAL, INC. SITE ASSESSMENT INDIANAPOLIS, MARION COUNTY, INDIANA

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Emergency Response Branch Region V 77 West Jackson Boulevard Chicago, Illinois 60604-3507

Prepared by:

WESTON SOLUTIONS, INC.

20 North Wacker Drive, Suite 1210 Chicago, Illinois 60606

September 29, 2010

Prepared by: Date: 9/29/10

Trenna Seilheimer

WESTON START Member

Reviewed and Approved by: ______ Date: 9/29/10

Rick Mehl

WESTON START Project Manager

TABLE OF CONTENTS

Se	ction		Page
1.	INT	RODUCTION	1
2.	SIT	E BACKGROUND	1
	2.1	SITE DESCRIPTION	2
	2.2	SITE HISTORY	3
	2.2.1	2007 Release Information	3
	2.2.2	2007 PCB Containing Oils Information	5
	2.2.3	2009 Release Information	5
	2.2.4	Current Information	6
3.	SIT	E ASSESSMENT ACTIVITIES	6
	3.1	SITE OBSERVATIONS	6
4.	ANA	ALYTICAL RESULTS	7
5.	THI	REATS TO HUMAN HEALTH AND THE ENVIRONMENT	7
6.	CO	NCLUSIONS AND RECOMMENDATIONS	9
	6.1	CONCLUSIONS	9
	6.2	RECOMMENDATIONS	

LIST OF FIGURES

Figure 1-1 Site Location Map
Figure 2-1 Site Features Map
Figure 2-2 Historical Sampling Events Location Map

LIST OF TABLES

Table 2-1	Site Features Designations
Table 2-2	2007 Spill Affected Areas
Table 2-3a	Summary of Historical Sampling Events
Table 2-3b	City of Indianapolis-DPW Historical Sampling Event Results
Table 2-3c	IDEM Historical Sampling Event Results
Table 2-3d	MCHD Historical Sampling Event Results
Table 2-3e	ESI Historical Sampling Event Results
Table 2-3f	Keramida Historical Sampling Event Results

LIST OF APPENDICES

Appendix A Photographic Documentation

LIST OF ABBREVIATIONS AND ACRONYMS

B&T Barnes & Thornburg, LLP

CFR Code of Federal Regulations

City City of Indianapolis

DAF Dissolved Air Flotation

DPW Department of Public Works

ERO Extended Range Organic

ESI Environmental, Inc.

ft² Square Feet

IDEM Indiana Department of Environmental Management

MCHD Marion County Health Department

MCL Maximum Concentration Limit

mg/kg Milligram per kilogram

mg/L Milligram per liter

NCP National Oil and Hazardous Substances Pollution Contingency Plan

OSC On-Scene Coordinator

PCB Polychlorinated Biphenyl

RISC Risk Integrated System of Closure

RSL Regional Screening Level

START Superfund Technical Assessment and Response Team

SVOC Semivolatile Organic Compound

TDD Technical Direction Document

TPH Total Petroleum Hydrocarbon

U.S. EPA U.S. Environmental Protection Agency

VOC Volatile Organic Compound

WESTON Weston Solutions, Inc.

WWTP Wastewater Treatment Plant

Revision: 0 Date: September 29, 2010

Page: 1

1. INTRODUCTION

The U.S. Environmental Protection Agency (U.S. EPA) tasked the Weston Solutions, Inc.

(WESTON®), Superfund Technical Assessment and Response Team (START) to assist U.S.

EPA On-Scene Coordinator (OSC) Verneta Simon in performing a site assessment at the ESI

Environmental, Inc. (ESI) site (Site), located in Indianapolis, Marion County, Indiana (Figure 1-

Under Technical Direction Document (TDD) number S05-0001-1008-022, U.S. EPA

requested that WESTON START document current site conditions; obtain photographic

documentation; and evaluate the potential for imminent and substantial threats to human health,

welfare, and the environment posed by Site-related conditions. On September 1, 2010,

WESTON START conducted a site walk under the direction of OSC Verneta Simon. U.S. EPA

member Bill Ryczik, Indiana Department of Environmental Management (IDEM) member Harry

Atkinson, ESI member Thomas Gawlik, and Barnes & Thornburg, LLP (B&T) member Michael

Scanlon were also present during the site walk.

This Site Assessment Report is organized into the following sections:

Introduction – Provides a brief description of the objective and scope of site assessment

activities

Site Background – Details the Site description and its known history

Site Assessment Activities – Discusses the site observations made during the site

assessment

Analytical Results – Discusses the historical analytical results for samples collected at

various residential and commercial properties

Threats to Human Health and the Environment – Identifies Site-related conditions

that may warrant a removal action under the National Oil and Hazardous Substances

Pollution Contingency Plan (NCP)

• Conclusions and Recommendations – Summarizes the site assessment findings and

recommendations for further Site activities as needed

2. SITE BACKGROUND

This section discuses the site description and history.

Revision: 0 Date: September 29, 2010

Page: 2

2.1 SITE DESCRIPTION

The Site is located at 4910 West 86th Street in Indianapolis, Marion County, Indiana and is situated in a commercial and industrial setting. The approximately 8-acre Site includes a wastewater treatment plant (WWTP) consisting of wastewater processing equipment, a sludge treatment building, a sludge treatment process, an oil dehydration process, and a truck off-loading building (Figure 2-1). The Site is bordered to the north by an industrial property, to the south by West 86th Street with commercial properties beyond, and to the east and west by open land. The coordinates for the Site are latitude 39.912866° North and longitude -86.24213° West.

The Site is a provider of liquid waste management services and a recycler of used oil under 40 Code of Federal Regulations (CFR) Part 279. The primary wastewater processing equipment includes API oil/water separators, dissolved air flotation (DAF) units, oil storage tanks, sand filters, rotary vacuum filters, plate and frame filter press, and oxidation pit. The facility collects, processes, recovers, and disposes of non-hazardous wastewater, a byproduct of industrial and commercial manufacturing plants. The Site has the capability to treat a variety of non-hazardous liquids and accepts bulk, drum, and containerized liquids. All loads received into the facility are treated and processed to separate contaminants. The water collected during this process is discharged separately into the City of Indianapolis (City) sanitary sewer system and the contaminants are further processed into a form that allows proper recycling or disposal. Any oils recovered from the process are shipped off-site for reclamation. The Site was designed such that all storm water falling in the Site is captured in its internal sewer system and is ultimately run through its wastewater processing equipment prior to being discharged into the City sanitary sewer system.

Figure 2-1 and Table 2-1 present the features of the Site. Over forty storage tanks (waste oil, raw water, sulfuric acid, caustics, hydrogen peroxide, and sludge), separators (oil-water), sumps (oil), and air strippers are located on-site and range in size as outlined below:

- One 1,000,000-gallon Oil Storage Tank ("A" on Figure 2-1) currently holds approximately 300,000-gallons of possible PCB containing sludge.
- Two 1,000,000-gallon Raw Water Storage Tanks ("J" on Figure 2-1) currently hold a total of approximately 1,500,000-gallons of material (East Tank contains approximately

Revision: 0 Date: September 29, 2010

Page: 3

900,000-gallons of sludge and West Tank contains approximately 600,000-gallons of sludge).

- Other storage tanks range in size from 3,000 to 90,000-gallons and contain waste oil, raw water, sulfuric acid, caustics, hydrogen peroxide, and sludge; however, the volume of material stored in each tank contents is unknown.
- Separator Tanks range in size from 3,000 to 30,000-gallons; however, the exact volume total of contents located on-site is unknown at this time
- Sump is 4,000-gallons; however, the volume total of contents located on-site is unknown at this time
- Air strippers range in size from 5,000 to 30,000-gallons; however, the exact volume total of contents located on-site is unknown at this time

2.2 SITE HISTORY

The following sections present the history of the Site.

2.2.1 2007 Release Information

A Spill Report dated August 29, 2007, states that a release from the Site occurred on March 15, 2007, during a heavy rain event. The material spilled was untreated oil and water from the Site that entered the City sanitary sewer system via a by-pass sewer (used for permitted special waste), that had been left open. The amount of material released during this event is unknown; however, according to site personnel, it was less than 500-gallons. Due to the heavy rain event, the City sanitary sewers overflowed at several locations in the northern portion of Indianapolis, which resulted in the deposition of the material and sewerage onto vegetation in residential and commercial areas (Figure 2-2 and Table 2-2). The basement of a residence was also impacted at one location.

Contaminated soil and debris was excavated from 25 residential properties and two golf courses. The affected basement was cleaned and the sump pump and hot water heater were replaced at the request of the homeowner. Subsequent to excavation activities, soil samples were collected from the residential properties using a 900 square foot (ft²) sampling grid and from the Coffin and Riverside Golf Courses using a 2,500 ft² sampling grid. Background samples were also collected at select areas.

Numerous sampling activities were conducted by various agencies from March through June

Revision: 0 Date: September 29, 2010

Page: 4

2007 (Table 2-3a through 2-3f) in the affected areas. Residential soil samples exceeded the

IDEM Risk Integrated System of Closure (RISC) Residential Total Petroleum Hydrocarbon

(TPH) Non-Default Closure Levels for extended range organics (ERO) (80 milligram per

kilogram [mg/kg]). The residential exceedances ranged from 85 to 2,900 mg/kg. Several

residential properties had TPH-ERO exceedances subsequent to two separate excavations.

IDEM stated the remaining exceedances could stay in place since the soil may be (a) partially

attributable to high background levels and (b) better remediated by natural processes including

natural degradation and phytoremediation. All TPH results for the golf courses were below the

applicable cleanup objectives. It should be noted that several concentrations of arsenic, mercury,

chromium, lead, and various volatile organic compounds (VOCs) and semivolatile organic

compounds (SVOCs) exceeded IDEM RISC Residential/Industrial Soil Default Closure Levels

and U.S. EPA Residential/Industrial Soil Regional Screening Levels (RSLs). It is unknown if

the exceedances are related to the 2007 release.

Wipe sampling was conducted in the basement of a residence using a 1 ft² sampling grid. All

results were below the applicable cleanup objectives.

Residential water well sampling was also conducted with all results below the applicable cleanup

objectives with the exception of arsenic (0.012 to 0.016 milligram per liter [mg/L]) which

exceeded the U.S. EPA Maximum Concentration Limits (MCLs). It is unknown if the

exceedances are related to the 2007 release.

A professional landscaper restored the lawns after the properties had been cleared by sampling

results. The course operators restored the golf courses.

A total of 6,000 gallons of oil and water was removed from the north storm sewer cistern and

transported to the Site for treatment. A total of 5,800 gallons of oil and water was removed from

the Coffin Golf Course Lake and transported to the Site for treatment. A total of 1,600 yards of

contaminated soil and debris was removed from impacted areas and transported offsite for

disposal.

I:\WO\START3\1184\42317RPT.DOC

1184-2A-AHYY

This document was prepared by Weston Solutions, Inc., expressly for U.S. EPA. It shall not be released or disclosed in whole or in part without the express written permission of U.S. EPA.

Revision: 0 Date: September 29, 2010

Page: 5

The north storm sewer cistern discovered by IDEM and Marion County Health Department

(MCHD) and initially identified as a potential source of the release was determined to be a non-

functioning sewer and was not the source of the oil from the incident. On April 10, 2007, the

pipe from the Site to the cistern was plugged and the cistern was filled with concrete to prevent

any possible problems with this structure in the future. On April 17, 2007, the by-pass sewer

was permanently sealed with concrete.

2.2.2 2007 PCB Containing Oils Information

On July 18, 2007, the Site was notified by a customer that it had discovered approximately 28

mg/kg of polychlorinated biphenyl (PCBs) in a used oil shipment from the Site. The customer

returned the shipment to the Site and it was placed in a segregated holding tank. Samples were

collected from each of the product storage frac tanks and other process tanks located at the Site

and analyzed for PCBs. The Site discovered that detectable PCBs were present in four loads of

oily water from one generator/transporter. All equipment was decontaminated with kerosene

beginning on August 1, 2007. The recovered kerosene was transferred to the Oil Storage Tank

designated "A" on Figure 2-1. In addition to the recovered kerosene, all pumpable materials

(liquid and suspended solids) that could be pumped through existing and temporary lines were

pumped to this tank. Materials that could not be pumped to this tank were placed in designated

frac tanks while recovered centrifuge solids were stored in the Oil Water Separator designated

"H" on Figure 2-1. These materials were disposed of off-site in July 2008.

From October 2008 to August 2009, approximately 660,000-gallons from Oil Storage Tank

("A") were transported off-site for disposal. This tank currently contains approximately 300,000

-gallons of sludge.

2.2.3 2009 Release Information

Reportedly another release occurred in early 2009. The City-Department of Public Works

(DPW) collected background, sludge, and soil samples from various residential and commercial

properties in February and April 2009 (Figure 2-2 and Tables 2-3a and 2-3b). Residential soil

samples exceeded the IDEM RISC Residential TPH Non-Default Closure Levels for ERO (80

mg/kg). The residential exceedances ranged from 230 to 3,800 mg/kg.

I:\WO\START3\1184\42317RPT.DOC

1184-2A-AHYY

This document was prepared by Weston Solutions, Inc., expressly for U.S. EPA. It shall not be released or disclosed in whole or in part without the express written permission of U.S. EPA.

Revision: 0 Date: September 29, 2010

Page: 6

2.2.4 Current Information

In anticipation of the Site being permanently shut down, a Partial Closure Plan was drafted

which focuses on managing storm water run-off post shut down to insure that the storm water

remains uncontaminated and is properly drained from the Site. The storm water would be

directed away from existing process equipment and allowed to flow into "Oil Creek" which runs

to the east of the Site. Storm water currently empties into one of the two Raw Water Storage

Tanks ("J").

In a press release dated September 27, 2010, ESI announced that it would discontinue accepting

waste material and end its operations effective September 28, 2010.

3. SITE ASSESSMENT ACTIVITIES

On September 1, 2010, U.S. EPA OSC Verneta Simon; U.S. EPA member Bill Ryczik, IDEM

member Harry Atkinson; ESI member Thomas Gawlik; B&T member Michael Scanlon; and

WESTON START member Marcus Muccianti conducted the site walk.

The objective for this site assessment was to determine whether the Site poses an imminent and

substantial threat to human health, human welfare, and the environment. No investigative

samples were collected during these activities. The site observations are discussed below.

3.1 SITE OBSERVATIONS

Observations during the site assessment are summarized below.

An asphalt and concrete berm surrounds the entire Site. A secure fence is also present

along the perimeter of the Site.

• The 1,000,000-gallon Oil Storage Tank ("A" on Figure 2-1) currently holds

approximately 300,000-gallons of possible PCB containing sludge.

The two 1,000,000-gallon Raw Water Storage Tanks ("J" on Figure 2-1) currently hold a total of approximately 1,500,000-gallons of material (East Tank contains approximately

900,000-gallons and West Tank contains approximately 600,000-gallons).

 All storage tanks onsite seem to have secondary containment; however, a complete assessment of the storage tanks, separators, sumps, strippers, and buildings was not

completed during this site assessment.

Revision: 0 Date: September 29, 2010

Page: 7

Appendix A provides photographic documentation of Site observations.

ANALYTICAL RESULTS 4.

As stated above, numerous sampling activities were conducted by various agencies from March

2007 to April 2009 (Tables 2-3a through 2-3f) in response to the releases in 2007 and 2009.

IDEM stated the remaining residential soil exceedances could stay in place since the soil may be

(a) partially attributable to high background levels and (b) better remediated by natural processes

including natural degradation and phytoremediation. During sampling events in 2007, several

concentrations of arsenic, mercury, chromium, lead, and various VOCs and SVOCs exceeded

RISC Residential/Industrial Soil Default Closure Levels and U.S. EPA

Residential/Industrial Soil RSLs. It is unknown if the exceedances are related to the 2007

release.

On March 22, 2007, eight residential properties were sampled and analyzed. Four of the eight

residences had exceedances of the U.S. EPA MCLs for arsenic. It is unknown if the exceedances

are related to the 2007 release.

On September 1, 2010, U.S. EPA, IDEM, ESI, B&T, and WESTON START conducted a site

walk. No investigative samples were collected during these activities.

5. THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

Factors to be considered in determining the appropriateness of a potential removal action at a

Site are delineated in the NCP at Title 40 of the CFR 300.415(b)(2). A summary of the factors

applicable to this Site is presented below.

Actual or potential exposure of nearby human populations, animals, or the food

chain to hazardous substances, pollutants, or contaminants

On March 15, 2007, a release from the Site occurred during a heavy rain event. The release was untreated oil and water from the Site that entered the City sanitary sewer system via a by-pass sewer (used for permitted special waste), that had been left open.

Twenty-five residential properties and two golf courses were affected by this incident.

I:\WO\START3\1184\42317RPT.DOC

1184-2A-AHYY

This document was prepared by Weston Solutions, Inc., expressly for U.S. EPA. It shall not be released or disclosed in whole or in part without the express written permission of U.S. EPA.

Reportedly another release occurred in the beginning of 2009. Sludge and soil samples were collected from eight residential properties and one golf course.

Two releases (2007 and 2009) have occurred at the Site resulting in residential property contamination of soils with TPH-ERO exceeding the IDEM RISC Residential TPH Non-Default Closure Levels.

• Actual or potential contamination of drinking water supplies or sensitive ecosystems

Subsequent to the 2007 release, of the 25 residential properties affected, 10 of them have a drinking water well present. On March 22, 2007, eight residential properties were sampled and analyzed. Four of the eight residences had exceedances of the U.S. EPA MCLs for arsenic (concentrations ranged from 0.012 to 0.016 mg/L).

There is no data for residential water well sampling subsequent to the 2009 release.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release

Over forty storage tanks (waste oil, raw water, sulfuric acid, caustics, hydrogen peroxide, and sludge), separators (oil-water), sumps (oil), and air strippers are located on-site and range in size from 3,000 to 1,000,000-gallons.

Two releases (2007 and 2009) have occurred at the Site resulting in residential property contamination of soils with TPH-ERO exceeding the IDEM RISC Residential TPH Non-Default Closure Levels.

• Weather conditions that may cause hazardous substances, pollutants, or contaminants to migrate or be released

A release from the Site occurred on March 15, 2007, during a heavy rain event. The release was untreated oil and water from the Site that entered the City sanitary sewer system via a by-pass sewer (used for permitted special waste), that had been left open. Due to the heavy rain event, the City sanitary sewers overflowed at several locations in the northern portion of Indianapolis, which resulted in the deposition of the material and sewerage onto vegetation in residential and commercial areas.

Reportedly another release occurred in the beginning of 2009. Based on the additional release subsequent to the permanent closure of the north storm sewer cistern and by-pass sewer on-site, it is unknown how the material from the Site appeared in the City sanitary sewer system and was released in the above mentioned areas.

These two releases (2007 and 2009) have occurred at the Site resulting in residential property contamination of soils with TPH-ERO exceeding the IDEM RISC Residential TPH Non-Default Closure Levels.

This section discusses the conclusions and recommendations based on the site assessment

findings.

6.1 CONCLUSIONS

On September 1, 2010, U.S. EPA, IDEM, ESI, B&T, and WESTON START conducted a site

valk. The objective for this site assessment was to determine whether the Site poses an

imminent and substantial threat to human health, human welfare, and the environment. No

investigative samples were collected during these activities. Based on the site walk, the

following observations were made:

• The 1,000,000-gallon Oil Storage Tank ("A" on Figure 2-1) currently holds

approximately 300,000-gallons of possible PCB containing sludge.

• The two 1,000,000-gallon Raw Water Storage Tanks ("J" on Figure 2-1) currently hold a

total of approximately 1,500,000-gallons of material (East Tank contains approximately 900,000-gallons of sludge and West Tank contains approximately 600,000-gallons of

sludge).

• Storm water currently empties into one of the two 1,000,000-gallon Raw Water Storage

Tanks ("J") and then discharges into the sanitary sewer.

• Other storage tanks range in size from 3,000 to 90,000-gallons and contain waste oil, raw

water, sulfuric acid, caustics, hydrogen peroxide, and sludge; however, the volume of

material stored in each tank contents is unknown.

A release from the Site occurred on March 15, 2007, during a heavy rain event. The release was

untreated oil and water from the Site that entered the City sanitary sewer system via a by-pass

sewer (used for permitted special waste), that had been left open. Due to the heavy rain event,

the City sanitary sewers overflowed at several locations in the northern portion of Indianapolis,

which resulted in the deposition of the material and sewerage onto vegetation in residential and

commercial areas. Twenty-five residential properties and two golf courses were affected by this

incident. On April 10, 2007, the pipe from the Site to the north storm sewer cistern was plugged

and the cistern was filled with concrete to prevent any possible problems with this structure in

the future. On April 17, 2007, the by-pass sewer was permanently sealed with concrete.

Revision: 0 Date: September 29, 2010

Page: 10

Reportedly another release occurred in the beginning of 2009. Eight residential properties and

one golf course had sludge and soil samples collected.

These two releases (2007 and 2009) have occurred at the Site resulting in residential property

contamination of soils with TPH-ERO exceeding the IDEM RISC Residential TPH Non-Default

Closure Levels.

In a press release dated September 27, 2010, ESI announced that it would discontinue accepting

waste material and end its operations effective September 28, 2010.

Contaminants and conditions at the Site meet criteria established in the NCP for a removal

action.

6.2 RECOMMENDATIONS

Based on information gathered during the site assessment, WESTON START recommendations

are summarized below.

A removal of wastes at the ESI site should be conducted to reduce the potential for a release of contaminated materials that could result in, but not limited to, any or all of the

following:

Actual or potential exposure of nearby human populations, animals, or the food

chain to hazardous substances, pollutants, or contaminants;

Actual or potential contamination of drinking water supplies or sensitive

ecosystems;

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or

other bulk storage containers, that may pose a threat of release; and

Weather conditions that may cause hazardous substances, pollutants, or

contaminants to migrate or be released.

In anticipation of the Site being permanently shut down, a Closure Plan should be

implemented to manage storm water run-off post and insure that the storm water remains

uncontaminated and is properly drained from the Site. Storm water currently empties into

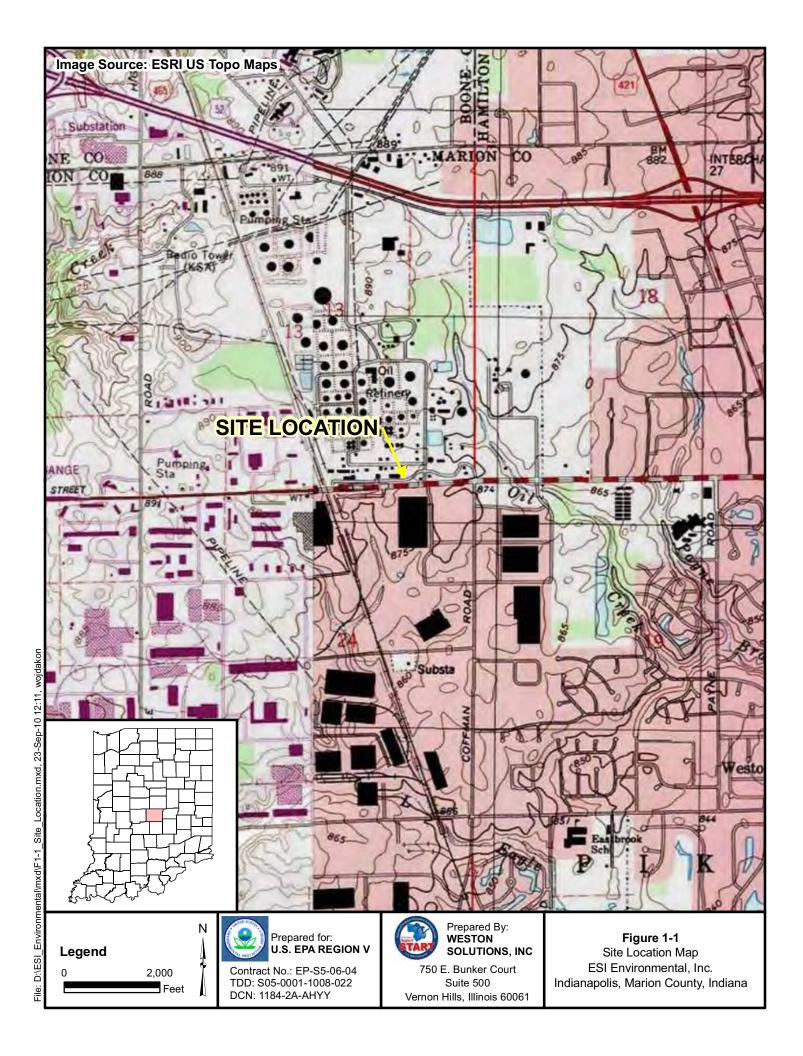
one of the two 1,000,000-gallon Raw Water Storage Tanks ("J").

I:\WO\START3\1184\42317RPT.DOC

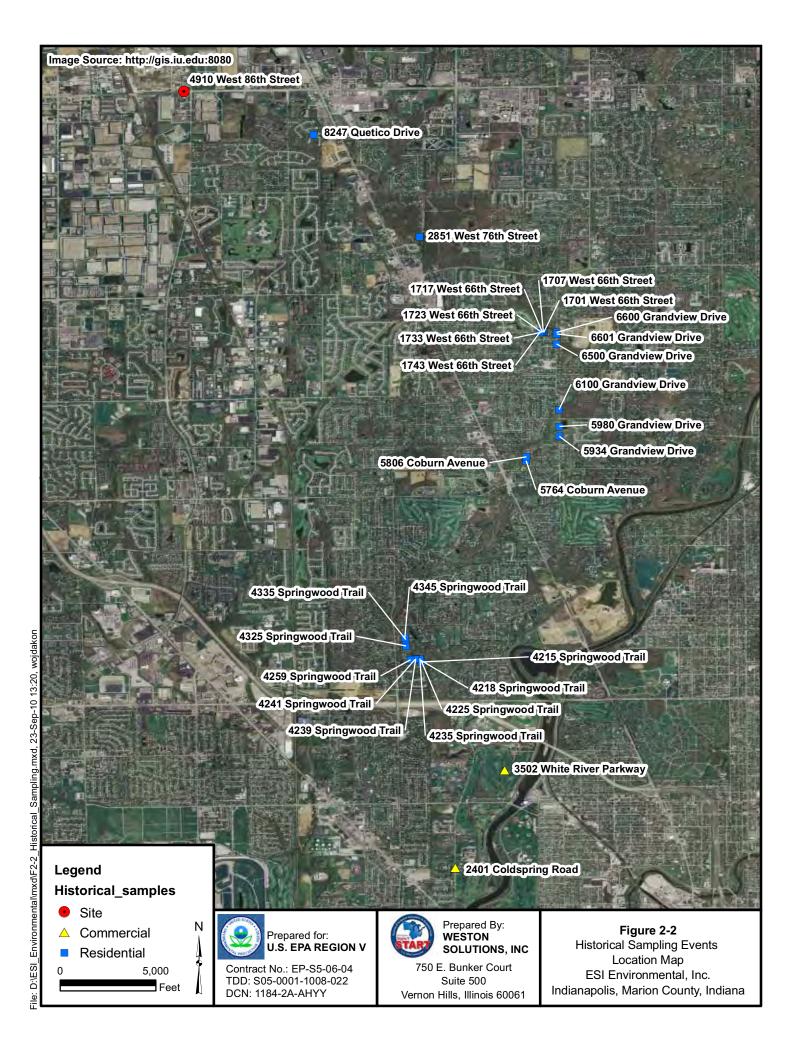
1184-2A-AHYY

This document was prepared by Weston Solutions, Inc., expressly for U.S. EPA. It shall not be released or disclosed in whole or in part without the express written permission of U.S. EPA.

FIGURES







TABLES

Table 2-1 Site Features Designations ESI Environmental, Inc. 4910 West 86th Street

Indianapolis, Marion County, IN

Designation	Description	Size (gallon)
A	Oil Storage Tank	1,000,000
В	Oil Skimming Storage Tank	10,000
C	Sample Storage Building	
D	Primary Separator	68,000
E	Frac Tank	22,000
F	Off Spec Oil Storage Frac Tanks	(7x) 22,000
G	Auxiliary Separator	30,000
Н	Oil Water Separator	3,000
I	Chemical Building	
J	Raw Water Storage Tanks	(2x) 1,000,000
K	Desmulsification Tank	90,000
L	Precipatation Tank	90,000
M	Caustic Storage Tank	3,000
N	Caustic Storage Tank	3,000
O	Caustic Storage Tank	10,000
P	Flocculant Building	
Q	API Oil/Water Separator	30,000
R	API Oil/Water Separator Sump	13,000
	Hydrogen Peroxide Storage Tank	7,000
S T	Caustic Storage Tank	7,000
U	Caustic Storage Tank	10,000
V	Caustic Storage Tank	7,000
W	Sulfuric Acid Storage Tank	10,000
X	Not In Use	10,000
Y	DAF Separators	(2x) 30,000
Z	Sulfuric Acid Storage Tank	7,000
AA	Oil Unloading Sump	4,000
BB	Oil Storage Tanks	(4x) 20,000
CC	Sulfuric Acid Storage Tank	10,000
DD	Oxidation Pit	30,000
EE	Sand Filter	(3x) 2,000
FF	Sludge Tank	(4x) 12,000
		(3x) 15,000
		20,0000
		22,500
GG	Off Spec Oil Storage Tanks	24,000
НН	Cent Feed Tank	22,000
II	Unloading Building	
JJ	Small Air Stripper	5,000
KK	Large Air Stripper	30,000
LL	Control Building	
MM	Storage Building	
NN	Dehydration Building	
00	Solids Building	

Notes:

Refer to Figure 2-1 for designation locations on-site

Table 2-2

2007 Spill Affected Areas ESI Environmental, Inc.

4910 West 86th Street

Indianapolis, Marion County, Indiana

		Water Well	
Designation	Address	Present	Affected Area
		(Y/N)	
Site	4910 West 86th Street, Indianapolis, IN	N	
Residential	8247 Quetico Drive, Indianapolis, IN	N	basement floor drain back-up and flooded with sewage/oil
Residential	2851 West 76th Street, Indianapolis, IN	Y	manhole overflowed in side yard
Residential	1701 West 66th Street, Indianapolis, IN	N	manhole overflowed in front yard
Residential	1707 West 66th Street, Indianapolis, IN	N	manhole overflowed in front yard
Residential	1717 West 66th Street, Indianapolis, IN	N	manhole overflowed in front yard
Residential	1723 West 66th Street, Indianapolis, IN	N	manhole overflowed in front yard
Residential	1733 West 66th Street, Indianapolis, IN	N	manhole overflowed in front yard
Residential	1743 West 66th Street, Indianapolis, IN	Y	manhole overflowed in front yard
Residential	5934 Grandview Drive, Indianapolis, IN	N	manhole overflowed in back yard
Residential	5980 Grandview Drive, Indianapolis, IN	N	manhole overflowed in back yard
Residential	6100 Grandview Drive, Indianapolis, IN	N	manhole overflowed along Grandview Drive
Residential	6500 Grandview Drive, Indianapolis, IN	N	manhole overflowed along Grandview Drive
Residential	6600 Grandview Drive, Indianapolis, IN	N	manhole overflowed in neighboring properties
Residential	6601 Grandview Drive, Indianapolis, IN	N	manhole overflowed along Grandview Drive
Residential	5764 Coburn Avenue, Indianapolis, IN	Y	manhole overflowed in back yard
Residential	5806 Coburn Avenue, Indianapolis, IN	N	manhole overflowed in back yard
Residential	4215 Springwood Trail, Indianapolis, IN	Y	manholes overflowed in Springwood Trail roadbed
Residential	4218 Springwood Trail, Indianapolis, IN	Y	manholes overflowed in Springwood Trail roadbed
Residential	4225 Springwood Trail, Indianapolis, IN	Y	manholes overflowed in Springwood Trail roadbed
Residential	4235 Springwood Trail, Indianapolis, IN	Y	manholes overflowed in Springwood Trail roadbed
Residential	4239 Springwood Trail, Indianapolis, IN	Y	manholes overflowed in Springwood Trail roadbed
Residential	4241 Springwood Trail, Indianapolis, IN	Y	manholes overflowed in Springwood Trail roadbed
Residential	4259 Springwood Trail, Indianapolis, IN	Y	manholes overflowed in Springwood Trail roadbed
	•		• •
Residential	4325 Springwood Trail, Indianapolis, IN	N	manhole overflowed in back yard of neighboring property
	1		, , , ,
Residential	4335 Springwood Trail, Indianapolis, IN	N	manhole overflowed in back yard of neighboring property
Residential	4345 Springwood Trail, Indianapolis, IN	N	manhole overflowed in back yard
Public	Manhole #930137	N	manhole overflowed in undeveloped woodland area
Public	Manhole #930009	N	manhole overflowed in undeveloped woodland area
Public	Manhole #930032	N	manhole overflowed in undeveloped woodland area
Public	Manhole #930033	N	manhole overflowed in undeveloped woodland area
Public	Manhole #930036	N	manhole overflowed in undeveloped woodland area
	Coffin Golf Course		1
Commercial	2401 Coldspring Road, Indianapolis, IN	N	manhole overflowed in area of 11th Hole
	Riverside Golf Course		manhole overflowed in area of 5th, 6th, 10th, and 13th
Commercial	3502 White River Parkway, Indianapolis, IN	N	Holes and small pond

Notes:

Refer to Figure 2-2 for designation locations on-site

Table 2-3a

Summary of Historical Sampling Events

ESI Environmental, Inc.

4910 West 86th Street

Indianapolis, Marion County, Indiana

						Analys	es		
Sample Date	Sampled By	Sample Area	Sample Type	TPH ¹	voc	svoc	РСВ	Metals	TCLP ²
3/16/2007	IDEM	Unknown	Solid (soil)	✓					
			Liquid (sewer)	✓ (no DRO)		✓		✓	
			Liquid (creek)	✓	✓				
			Liquid (other)						
			Sludge (oil)	✓(no DRO)		✓		✓	
3/16/2007	MCHD	Various Residential ESI	Solid (soil)	,	✓			✓	
3/19/2007	ESI	ESI	Solid (soil)						✓ (no SVOC)
3/21/2007	City-DPW	Commercial (golf courses)	Solid (soil, bg) Liquid (pond)	✓	✓	√		✓	✓
3/22/2007	ESI	Various Residential	Liquid (water wells)		<i>√</i>	✓	✓	✓	
3/26/2007	City-DPW	ESI- Storm Inlet	Sludge (oil)	✓				✓	✓
4/2007- 5/2007	Keramida	Various Residential Commercial (golf courses)	Solid (soil, bg)	✓ (no DRO)	✓ (only PCE)				
6/7/2007	Keramida	Residential	Wipe	✓	✓				
11/19/2008	City-DPW	Various Residential	Solid (soil, bg) Solid (manhole)	✓(no DRO)					
2/12/2009	City-DPW	Commercial (golf course) Various Residential	Solid (soil, bg)	✓ (only ERO)					
4/7/2009	City-DPW	Various Residential	Solid (soil) Solid (soil, bg)	✓ (no DRO)			✓		

Notes:

bg - background

City - City of Indianapolis

DPW - Department of Public Works

DRO - Diesel Range Organic

ERO - Extended Range Organic

ESI – ESI Environmental, Inc.

GRO - Gasoline Range Organic

IDEM – Indiana Department of Environmental Management

Keramida - Keramida Environmental

MCHD - Marion County Health Department

PCB – Polychlorinated Biphenyl

PCE - Tetrachloroethane

SVOC - Semivolatile Organic Compound

TCLP - Toxicity Characteristic Leaching Procedure

TPH – Total Petroleum Hydrocarbon

VOC - Volatile Organic Compound

¹-TPH includes DRO, GRO, ERO

²-TCLP includes VOCs, SVOCs, Metals

Table 2-3b City of Indianapolis-DPW Historical Sampling Event Results ESI Environmental, Inc.

4910 West 86th Street

						l					tal Meta					<u> </u>			Т	CLP (n	1g/L)				
Sample ID	Sample Date	TPH-GRO (mg/kg)	TPH-ERO (mg/kg)	TPH-DRO (mg/kg)	VOCs (mg/kg)	SVOCs (mg/kg)	PCBs (mg/kg)	As	Ba	Cd	Cr	Pb	Se	Ag	Hg	VOCs (µg/L)	SVOCs (µg/L)	As	Ba	Cd	Cr	Pb	Se	Ag	Hg (µg/L)
2851 West 76th	Street, Ind	<u>l</u> ianapolis, IN	<u>I</u> V		<u> </u>			l								(μg/L)	(μg/L)			1			1		(μg/L)
Sludge			3,000,000	67,000												BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
Background	02/12/09		52																						
1			780																						
1733 West 66th	Street, Ind	ianapolis, IN	1																						
1		BDL	1,300																						
2	04/18/07	BDL	2,900																						
3	04/10/07	BDL	1,200																						
4		BDL	500																						
Background	11/19/08	BDL	13																						
1	11/15/00		78													BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
Sludge			<u>340,000</u>	<u>130,000</u>																					
Background	02/12/09		6.3																						
1			8.9													BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
Background	04/07/09	0.36	400				BRL																		
1		0.11	1,100				BRL									BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
5764 Coburn St	reet, Indiar	napolis, IN				ı				1				1											
Sludge	00/10/00		<u>390,000</u>	<u>96,000</u>												BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
Background	02/12/09		25																						
1			3,100													BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
5800 Coburn St	reet, Indiai		40		1	ı				1				1	1	ı	ı		ı	1	1	ı	1	1	
Background	04/07/09	0.11	40																						
1	1 T 21 T		1,600																						
4241 Springwoo	04/07/09		3,800		1			I	I						I	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL	BRL
4253 Springwoo		9.1														DKL	DKL	DKL	DKL	DKL	DKL	DKL	DKL	DKL	DKL
Sludge	oa 1 ran, m	manapons, 1 	450,000	82,000			DDI								I				I	1	1	I	1		
Background	02/12/09		20				BRL																		
1	02/12/09		230																						
Riverside Golf (Course		230																						
Background		BRL	20	BRL				6.04	96.9	BRL	12.6	21.0	BRL	BRL	BRL	BRL	BRL	BRL	0.392	BRL	BRL	BRL	BRL	BRL	BRL
1	03/21/07	BRL	210	BRL				5.84	89.2	BRL	13.4	24.1	BRL	BRL	183	BRL	BRL	BRL	0.297	BRL	BRL	BRL	BRL	BRL	BRL
Coffin Golf Cou	irse	BILE	210	DILL				5.01	07.2	DILL	13.1	2	DILL	DILL	105	DILL	DILL	DILL	0.277	DILE	DICE	DICE	BRE	DILE	DICE
Background		BRL	37	BRL				4.63	58.9	BRL	7.1	37.2	BRL	BRL	246	BRL	BRL	BRL	0.588	BRL	BRL	BRL	BRL	BRL	BRL
1		BRL	26	BRL				4.97	61.8	BRL	8.38	18.5	BRL	BRL	1120	BRL	BRL	BRL	0.713	BRL	BRL	BRL	BRL	BRL	BRL
2	03/21/07	BRL	BRL	BRL				3.3	66.1	BRL	7.56	14.6	BRL	BRL	54	BRL	BRL	BRL	0.701	BRL	BRL	BRL	BRL	BRL	BRL
Pond		BRL	BRL	7	BRL	BRL		0.062	1.74	BRL	0.145		BRL	BRL	1.03										
Background	00/10/00		20																						
1	02/12/09		270																						
ESI - 4910 West	86th Stree	t, Indianapo																		•			•		
		<u> </u>														70*	140*								
Storm Inlet	03/26/07	190	<u>62,000</u>	<u>2,200</u>				1.08	43.9	0.367	16.3	17	BRL	BRL	BRL	(benzene)	(cresols)	BRL	0.322	BRL	BRL	BRL	BRL	BRL	BRL

Table 2-3b

City of Indianapolis-DPW Historical Sampling Event Results

ESI Environmental, Inc.

4910 West 86th Street

Indianapolis, Marion County, Indiana

	Sample	TPH.GRO	TPH-ERO	TPH-DRO	VOCs	SVOCs	PCBs			To	tal Meta	als (mg/	kg)						T	CLP (m	g/L)				
Sample ID	Date	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	As	Ba	Cd	Cr	Pb	Se	Ag	Hg	VOCs (µg/L)	SVOCs (µg/L)	As	Ba	Cd	Cr	Pb	Se	Ag	Hg (µg/L)
1326 Munsee C	326 Munsee Circle, Indianapolis, IN																								
Sludge			<u>410,000</u>	<u>120,000</u>																					
Background			73																						
1	1		37																						
1	04/07/09	1.1	410																						
7041 Grandviev	w Drive, Ind	lianapolis, II	N																				•		
1	04/07/09	0.14	75																						

Notes:

Exceeds IDEM RISC Residential Soil Default Closure Levels

Exceeds IDEM RISC Industrial Soil Default Closure Levels

Exceeds IDEM RISC TPH Residential Soil Non-Default Closure Levels (Migration to Groundwater) - most stringent

Exceeds IDEM RISC TPH Industrial Soil Non-Default Closure Levels (Migration to Groundwater) - most stringent

Exceeds U.S. EPA Residential Soil Regional Screening Levels

Exceeds U.S. EPA Industrial Soil Regional Screening Levels

* - all other constituents BRL

"--" - not analyzed

mg/kg - millgram per kilogram

mg/L - milligram per liter

μg/L - microgram per liter

Ag - silver

As - arsenic

Ba - barium

BDL - below detection limit

BRL - below reporting limit

Cd - cadmium

Cr - chromium

DRO - diesel range organic

ERO - extended range organic

GRO - gasoline range organic

Hg - mercury

ID - identification

Pb - lead

PCB - polychlorinated biphynels

Se - selenium

SVOC - semivolatile organic compound

TCLP - toxicity characteristic leaching procedure

TPH - total petroleum hydrocarbon

VOC - volatile organic compound

Table 2-3c IDEM Historical Sampling Event Results ESI Environmental, Inc. 4910 West 86th Street

				Non-					To	tal Met	als (mg/	kg)		
Sample ID	Sample Date	TPH-GRO (mg/kg)	TPH-ERO (mg/kg)	Halogenated Organics** (mg/kg)	VOCs (mg/kg)	SVOCs (mg/kg)	As	Ba	Cd	Cr	Pb	Se	Ag	Hg
Soil (LQ4137)	03/16/07	BDL	82000	<u>220000</u>	*0.49 (Eth) 1.5 (Sty) 2.7 (Xyl) 1.8 (Naph)	BDL	3.4	160	0.2	47	64	0.41	1.1	0.21
Soil (LQ4138)	03/17/07	220	370000	<u>800000</u>	*5.1 (Ace) 2.1 (2-But) 3.6 (Eth) 12 (Sty) 0.56 (PCE) 4.9 (Tol) 18 (Xyl) 0.92 (Iso) 4.9 (Naph)	BDL	3	410	0.98	150	130	0.33	3.4	0.54
Soil (LQ4139)	03/17/07	740	240000	NA	*2.7 (MIK) 5.5 (Ace) 7.4 (Ben) 1.1 (2-But) 0.45 (Chloro) 22 (Eth) 1 (Met) 1.4 (Sty) 1.7 (PCE) 89 (Tol) 0.62 (TCE) 100 (Xyl) 1.6 (Iso) 8.4 (Naph)	*440 (2-Met) 300 (Bis)	2.5	230	1.6	65	78	0.46	1.8	0.21

Table 2-3c

IDEM Historical Sampling Event Results

ESI Environmental, Inc. 4910 West 86th Street

				Non-					To	tal Meta	als (mg/	kg)		
Sample ID	Sample Date	TPH-GRO (mg/kg)	TPH-ERO (mg/kg)	Halogenated Organics* (mg/kg)	VOCs (mg/kg)	SVOCs (mg/kg)	As	Ba	Cd	Cr	Pb	Se	Ag	Hg
Soil (LQ4140)	03/17/07	370	330000	<u>800000</u>	*0.74 (Ben) 1.1 (2-But) 8.2 (Eth) 48 (Sty) 1.2 (PCE) 14 (Tol) 37 (Xyl) 1.4 (Iso) 9 (Naph)	BDL	2.9	350	0.61	160	130	0.37	3.8	0.79
Soil (LQ4141)	03/18/07	370	380000	<u>880000</u>	*0.85 (Ben) 1.3 (2-But) 7.9 (Eth) 13 (Sty) 1.8 (PCE) 14 (Tol) 38 (Xyl) 1.6 (Iso) 13 (Naph)	BDL	3.9	410	0.87	130	110	0.43	2.5	0.44
Liquid-Sewer (LQ4142)	03/17/07	3400	450000	BDL	*19 (Ben) 0.8 (Chlorob) 0.86 (Chloro) 1.6 (Cis-1,2-DCE) 71 (Eth) 6.8 (Sty) 15 (PCE) 180 (Tol) 6 (TCE) 310 (Xyl) 15 (Iso) 67 (Naph)	*530 (2-Met) 320 (Bis) 160 (Phen)	0.66	25	0.23	10	22	0.2	BDL	BDL
Sludge-Oil (LQ4145)	03/17/07	BDL	<u>1300000</u>	BDL	BDL	BDL	BDL	5.3	BDL	0.14	BDL	BDL	BDL	BDL

Table 2-3c

IDEM Historical Sampling Event Results

ESI Environmental, Inc.

4910 West 86th Street

Indianapolis, Marion County, Indiana

				Non-					To	tal Met	als (mg/	L)		
Sample ID	Sample Date	TPH-GRO (mg/L)	TPH-ERO (mg/L)	Halogenated Organics** (mg/L)	VOCs (mg/L)	SVOCs (mg/L)	As	Ba	Cd	Cr	Pb	Se	Ag	Hg
Liquid-Creek (LQ4143)	03/19/07	BDL	2	5.1	BDL	BDL	BDL	0.059	BDL	BDL	0.008	BDL	BDL	BDL
Liquid-Other (LQ4144)	03/20/07	NA	NA	NA	BDL	NA	NA	NA	NA	NA	NA	NA	NA	NA

Notes:

Exceeds IDEM RISC Residential Soil Default Closure Levels

Exceeds IDEM RISC Industrial Soil Default Closure Levels

Exceeds IDEM RISC TPH Residential Soil Non-Default Closure Levels (Migration to Groundwater) - most stringent

Exceeds IDEM RISC TPH Industrial Soil Non-Default Closure Levels (Migration to Groundwater) - most stringent

Exceeds U.S. EPA Residential Soil Regional Screening Levels

Exceeds U.S. EPA Industrial Soil Regional Screening Levels

* - all other constituents BDL

** - client provided material

mg/kg - millgram per kilogram

mg/L - milligram per liter

2-But - 2-butanone

1-Met - 2-methylnaphthalene

Ace - acetone

Ag - silver

As - arsenic

Ba - barium

Ben - benzene

BDL - below detection limit

Bis - bis(2-ethylhexyl)phlatate

Cd - cadmium

Chloro - chloroform

Chlorob - Chlorobenzene

Cis-1,2-DCE - cis-1,2-dichloroethene

Cr - chromium

ERO - extended range organic

Eth - ethylbenzene

GRO - gasoline range organic

Hg - mercury

ID - identification

Iso - isopropylbenzene

Met - methylene chloride

MIK - methyl isobutyl ketone

NA - not analyzed

Naph - naphthalene

Pb - lead

PCE - tetrachloroethane

Phen - phenanthrene

Se - selenium

Sty - styrene

SVOC - semivolatile organic compound

TCE - trichloroethene

Tol - toluene

TPH - total petroleum hydrocarbon

VOC - volatile organic compound

Xvl - xvlene

Table 2-3d

MCHD Historical Sampling Event Results ESI Environmental, Inc.

4910 West 86th Street

Indianapolis, Marion County, Indiana

	Sample	VOC					Total Meta	als (mg/kg)					
Sample ID	Date	(mg/kg)	As	Ba	Cd	Cr	Pb	Cu	Ni	Fe (µg/L)	Zn	Hg	
2851 West 7	6th Street, I	ndianapolis, IN											
1	03/16/07	BDL	4.0	345	1.1	65.9	96.7	690	60.1	13400	559	0.95	
8247 Quetico Drive, Indianapolis, IN													
1	03/16/07	BDL	7.5	745	1.9	141	124	1190	107	NA	1020	1.6	
ESI - 4910 V	West 86th St	reet, Indianapolis	s, IN										
		*321 (toluene)											
1	03/16/07	222 (xylene)	2.4	43.6	0.52	17.9	36.6	139	27.3	NA	152	0.17	
1733 West 6	66th Street, I	ndianapolis, IN											
1	03/16/07	BDL	4.3	358	1.0	70.5	112	861	66.8	NA	615	1.2	
5764 Cobur	n Street, Ind	ianapolis, IN		•			•	•	•		•		
1	03/16/07	BDL	4.3	407	1.2	80.6	112	783	69.0	NA	604	1.2	

Notes:

Exceeds IDEM RISC Residential Soil Default Closure Levels

Exceeds IDEM RISC Industrial Soil Default Closure Levels

Exceeds IDEM RISC TPH Residential Soil Non-Default Closure Levels (Migration to Groundwater) - most stringent

Exceeds IDEM RISC TPH Industrial Soil Non-Default Closure Levels (Migration to Groundwater) - most stringent

Exceeds U.S. EPA Residential Soil Regional Screening Levels

Exceeds U.S. EPA Industrial Soil Regional Screening Levels

* - all other constituents BDL

mg/kg - millgram per kilogram

 $\mu g/L$ - microgram per liter

As - arsenic

Ba - barium

BDL - below detection limit

Cd - cadmium

Cr - chromium

Cu - copper

Fe - iron

Hg - mercury

ID - identification

Ni - nickel

Pb - lead

VOC - volatile organic compound

Zn - zinc

Table 2-3e

ESI Historical Sampling Event Results ESI Environmental, Inc.

ESI Environmental, Inc 4910 West 86th Street

Indianapolis, Marion County, Indiana

	Sample	VOC	SVOC	РСВ			To	tal Met	als (mg/	L)						T(CLP (pp	m)			
Sample ID	Date	(µg/L)	(μg/L)	(μg/L)	As	Ba	Cd	Cr	Pb	Se	Ag	Hg	VOC	As	Ba	Cd	Cr	Pb	Se	Ag	Hg
Soil																					
Scrapings	03/19/07												BDL	BDL	3.23	BDL	BDL	BDL	BDL	BDL	BDL
2851 West 7	6th Street, Ir	ndianapo	lis, IN																		
1	03/22/07	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL									
1743 West 6	6th Street, Ir	ndianapo	lis, IN																		
1	03/22/07	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL									
5764 Cobur	n Street, Indi	ianapolis	, IN																		
1	03/22/07	BDL	BDL	BDL	BDL	0.23	BDL	BDL	BDL	BDL	BDL	BDL									
4215 Spring	wood Trail, l	Indianap	olis, IN																		
1	03/22/07	BDL	BDL	BDL	0.014	0.18	BDL	BDL	BDL	BDL	BDL	BDL									
4218 Spring	wood Trail, l	Indianap	olis, IN																		
1	03/22/07	BDL	BDL	BDL	0.012	0.26	BDL	BDL	BDL	BDL	BDL	BDL									
4239 Spring	wood Trail, l	Indianap	olis, IN																		
1	03/22/07	BDL	BDL	BDL	0.014	BDL	BDL	BDL	BDL	BDL	BDL	BDL									
4241 Spring	wood Trail, l	Indianap	olis, IN																		
1	03/22/07	BDL	BDL	BDL	0.016	0.3	BDL	BDL	BDL	BDL	BDL	BDL									
4259 Spring	wood Trail, l	Indianap	olis, IN																		
1	03/22/07	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL									

Notes:

Exceeds U.S. EPA Maximum Contaminant Levels

"--" - not analyzed

mg/L - milligram per liter $\mu g/L$ - microgram per liter

Ag - silver

As - arsenic

Ba - barium

BDL - below detection limit

Cd - cadmium Cr - chromium Hg - mercury ID - identification

Pb - lead

PCB - polychlorinated biphynels

ppm - part per million

Se - selenium

SVOC - semivolatile organic compound

TCLP - toxicity characteristic leaching procedure

VOC - volatile organic compound

Table 2-3f

Keramida Historical Sampling Event Results ESI Environmental, Inc.

4910 West 86th Street

Sample ID	Sample	PCE	TPH-GRO	TPH-ERO	TPH-DRO	BTEX	Sample	TPH-ERO
Sample ID	Date 1	(µg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg)	Date 2	(mg/kg)
2851 West 76th S	Street, Indian	apolis, IN						
1	04/17/07	BDL	16	800	NA	NA	05/21/07	420
2	04/17/07	BDL	BDL	730	NA	NA	05/21/07	230
3	04/17/07	BDL	BDL	430	NA	NA	N	A
4	04/17/07	BDL	BDL	650	NA	NA	05/21/07	420
5	04/17/07	BDL	BDL	280	NA	NA	N	A
6	04/17/07	BDL	BDL	340	NA	NA	N	A
1701 West 66th S	Street, Indian	apolis, IN						
1	04/18/07	BDL	BDL	610	NA	NA	N	A
2	04/18/07	BDL	BDL	1200	NA	NA	05/18/07	210
1707 West 66th S	Street, Indian	apolis, IN						•
1	04/18/07	BDL	BDL	440	NA	NA	05/18/07	250
2	04/18/07	BDL	BDL	200	NA	NA	N	A
1717 West 66th S	Street, Indian	apolis, IN						
1	04/18/07	BDL	BDL	460	NA	NA	N	A
2	04/18/07	BDL	BDL	980	NA	NA	05/18/07	180
1723 West 66th S	Street, Indian	apolis, IN	•		•			•
1	04/18/07	BDL	BDL	2300	NA	NA	N	A
2	04/18/07	BDL	BDL	2200	NA	NA	05/18/07	110
1733 West 66th S	Street, Indian	apolis, IN	•		•			•
1	04/18/07	BDL	BDL	1300	NA	NA	N	A
2	04/18/07	BDL	BDL	2900	NA	NA	05/18/07	160
3	04/18/07	BDL	BDL	1200	NA	NA	N	A
4	04/18/07	BDL	BDL	500	NA	NA	N	A
1743 West 66th S	Street, Indian	apolis, IN	•					
1	04/17/07	BDL	BDL	100	NA	NA	N	A
2	04/17/07	BDL	BDL	86	NA	NA	05/21/07	39
3	04/17/07	BDL	BDL	120	NA	NA	N	A
4	04/17/07	BDL	BDL	190	NA	NA	N	
5	04/17/07	BDL	BDL	460	NA	NA	N	
1745 West 66th S							_	
Background	05/08/07	NA	NA	49	NA	NA	N	A
6500 Grandview	Drive, Indian	apolis, IN	-					
1	04/19/07	BDL	BDL	190	NA	NA	N	A
2	04/19/07	BDL	BDL	88	NA	NA	N	A
6550 Grandview		apolis, IN	•	-	•			
Background	05/08/07	NA	NA	140	NA	NA	N	A
6600 Grandview	Drive, Indian	apolis, IN	•	-	•			
1	04/19/07	BDL	BDL	340	NA	NA	N	A

Table 2-3f

Keramida Historical Sampling Event Results ESI Environmental, Inc.

4910 West 86th Street

~ · · · ·	Sample	PCE	TPH-GRO	TPH-ERO	TPH-DRO	BTEX	Sample	TPH-ERO
Sample ID	Date 1	(µg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg)	Date 2	(mg/kg)
6601 Grandview			(<u>B</u> <u>B</u> /	(((==- B /	****	1 (8/8/
1	04/18/07	BDL	BDL	160	NA	NA	N	JA
2	04/18/07	BDL	BDL	85	NA	NA		VA
3	04/18/07	BDL	BDL	220	NA	NA		VA
4	04/18/07	BDL	BDL	120	NA	NA		VA VA
5	04/18/07	BDL	BDL	210	NA	NA		VA
6	04/18/07	BDL	BDL	420	NA	NA		VA
7	04/18/07	BDL	BDL	350	NA	NA		VA
8	04/18/07	BDL	BDL	490	NA	NA		VA
9	04/19/07	BDL	BDL	510	NA	NA		VA
10	04/19/07	BDL	BDL	110	NA	NA		VA
11	04/19/07	BDL	BDL	450	NA NA	NA		VA.
5764 Coburn Str			DDL	430	IVA	IVA	1	NA .
1	04/20/07	BDL	BDL	340	NA	NA	N	JA
2	04/20/07	BDL	BDL	560	NA NA	NA NA		VA VA
3	04/20/07	BDL	BDL	570	NA NA	NA NA		VA VA
4	04/20/07	BDL	BDL	280	NA NA	NA NA		
5	04/20/07	BDL	BDL	170	NA NA	NA NA	NA NA	
6	04/20/07	BDL	BDL	90	NA NA	NA NA	NA NA	
7	04/20/07	BDL	BDL	34	NA NA	NA NA		VA VA
			BDL	34	NA	NA	1	NA .
1 Tobber 1	04/19/07	BDL	BDL	170	NA	NA	N	T A
2	04/19/07	BDL	BDL	330	NA NA	NA NA	NA NA	
3	04/19/07	BDL	BDL	190	NA NA	NA NA		VA VA
5980 Coburn Str			BDL	190	NA	NA	Ţ	NA .
1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	04/19/07	0.011	BDL	35	NA	NA		JA
2851 West 76th S			BDL	33	NA	NA	ľ	NA
2851 West 76th 8	04/20/07		12	120	I NIA I	NT A		Τ Α
/ 4210 C		0.0060	13	120	NA	NA	Γ	JA .
4218 Springwood	04/23/07	BDL	BDL	200	I NIA I	NT A		Т А
1 4225 C			BDL	280	NA	NA	Γ	JA .
4225 Springwood			DDI	460	I NIA I	NT A		т А
1 4225 C	04/23/07	BDL	BDL	460	NA	NA	ľ	VA.
4235 Springwood			DDI	1100	I NIA I	NT A		Т А
1	04/23/07	BDL	BDL	1100	NA	NA	Γ	JA .
4239 Springwood			DDi	170	NT A	NT A	3	Τ Λ
1 4241 Cm;	04/23/07	BDL	BDL	170	NA	NA	ľ	JA .
4241 Springwood		<u> </u>	DDI	400	NT A	TA T A	,	T A
1 4250 Cm;	04/23/07	BDL	BDL	420	NA	NA	N	JA .
4259 Springwood			DDI	71	NT A	TA T A		T A
1	04/23/07	BDL	BDL	71	NA NA	NA NA		JA
2	04/23/07	BDL	BDL	270	NA	NA	l N	JA .
4335 Springwood			DDI	0.50	NI.	NT 4		T A
1	04/23/07	BDL	BDL	860	NA	NA		VA.
2	05/01/07	BDL	BDL	89	NA	NA		NA .
3	05/01/07	BDL	BDL	100	NA	NA		NA .
4	05/01/07	BDL	BDL	23	NA	NA	N	IA .

Table 2-3f

Keramida Historical Sampling Event Results ESI Environmental, Inc.

4910 West 86th Street

Sample ID 4345 Springwood	Sample Date 1	PCE	TPH-GRO				Sample	TPH-ERO
4345 Springwood	Date	(µg/kg)	(mg/kg)	(mg/kg)	TPH-DRO (mg/kg)	BTEX (mg)	Date 2	(mg/kg)
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			(IIIg/Kg)	(IIIg/Kg)	(IIIg/Kg)	(IIIg)	Date 2	(IIIg/Kg)
	04/23/07	BDL	BDL	250	NA	NA	N	Α.
2	04/23/07	BDL	BDL	560	NA NA	NA NA		A
3	04/23/07	BDL	BDL	470	NA NA	NA NA		A
4	04/23/07		BDL					
Riverside Golf Co		BDL	DDL	410	NA	NA	N	A
RSGC10-1	04/24/07	NA	BDL	74	NA	NA	N	Α.
RSGC10-1	04/24/07	NA NA	BDL	77	NA NA	NA NA		
RSGC10-2	04/24/07	NA NA	BDL	270	NA NA	NA NA	NA NA	
RSGC12-2-1 RSGC12-2-2	04/24/07	NA NA	14	140	NA NA	NA NA	NA NA	
RSGC12-2-3	04/24/07	NA NA	BDL	73	NA NA	NA NA	N	
RSGC12-2-3 RSGC12-2-4	04/24/07	NA NA	BDL	290	NA NA	NA NA		A
RSGC12-2-4 RSGC12-2-5	04/24/07	NA NA	BDL	94	NA NA	NA NA		A
RSGC12-2-5 RSGC12-3SW	04/24/07	NA NA	BDL	73	NA NA	NA NA		A
RSGC12-4N	04/24/07	NA NA	BDL	290	NA NA	NA NA	N N	
RSGC12-4N RSGC12-5W	04/24/07	NA NA	BDL	94	NA NA	NA NA	N N	
RSGC12-3W RSGC13-1E	04/24/07	NA NA	BDL	69	NA NA	NA NA	N N	
RSGC13-1E RSGC13-2S	04/24/07	NA NA	BDL	75	NA NA	NA NA		
RSGC13-2S RSGC13-3N	04/24/07	NA NA	BDL	570	NA NA	NA NA	NA NA	
RSGC13-3N	04/24/07	NA NA	BDL	56	NA NA	NA NA		A A
Coffin Golf Cours		NA	DDL	36	NA	NA	IN	A
CGC11-1	05/01/07	NA	BDL	39	NA	NA	N	Α.
CGC11-1	05/01/07	NA NA	BDL	51	NA NA	NA		A
CGC11-2 CGC11-3	05/01/07	NA NA	BDL	56	NA NA	NA NA		A
CGC11-3	05/01/07	NA NA	BDL	27	NA NA	NA		A
CGC11-4 CGC11-5	05/01/07	NA NA	BDL	BDL	NA NA	NA		A
CGC11-5	05/01/07	NA NA	BDL	130	NA NA	NA		A
CGC11-0	05/01/07	NA NA	BDL	18	NA NA	NA		Ā
CGC11-7	05/01/07	NA NA	BDL	54	NA NA	NA		A
CGC11-8	05/01/07	NA NA	BDL	36	NA NA	NA		Ā
CGC11-10	05/01/07	NA NA	BDL	26	NA NA	NA		Ā
CGC11-10	05/01/07	NA NA	BDL	BDL	NA NA	NA	N	
CGC11-11 CGC11-12	05/01/07	NA NA	BDL	BDL	NA NA	NA		Ā
CGC11-12	05/01/07	NA NA	BDL	440	NA NA	NA		Ā
CGC11-13	05/02/07	NA NA	BDL	71	NA NA	NA	N	
CGC11-14 CGC11-15	05/02/07	NA NA	BDL	130	NA NA	NA		Ā
CGC11-15	05/02/07	NA NA	BDL	32	NA NA	NA		Ā
CGC11-10	05/02/07	NA NA	BDL	64	NA NA	NA		Ā
CGC17-17	05/02/07	NA NA	BDL	BDL	NA NA	NA		A
CGC17-18	05/02/07	NA NA	BDL	300	NA NA	NA		Ā
CGC10-19	05/02/07	NA	BDL	47	NA	NA		Ā
Unknown Location		1 11 1	שטע	17	11/11	1117	11	
ET-1	04/24/07	NA	BDL	BDL	NA	NA	N	Ā
EC-1	04/24/07	NA	BDL	13	NA	NA	NA NA	
WC1-1	04/24/07	NA NA	BDL	15	NA	NA		Ā
WC1-2	04/24/07	NA	BDL	27	NA	NA		Ā
W2-1	04/24/07	NA	BDL	22	NA	NA		Ā
W2-1 W2-2	04/24/07	NA NA	BDL	74	NA NA	NA		Ā

Table 2-3f

Keramida Historical Sampling Event Results ESI Environmental, Inc.

4910 West 86th Street

Indianapolis, Marion County, Indiana

Sample ID	Sample Date 1	PCE (µg/kg)	TPH-GRO (mg/kg)	TPH-ERO (mg/kg)	TPH-DRO (mg/kg)	BTEX (mg)	Sample Date 2	TPH-ERO (mg/kg)		
Product Analysis-Sewer										
AB33305		17.1	<u>16437</u>	<u> 38257</u>	NA	NA	NA			
Product Analysis-East Million										
AB33306		14	<u>25824</u>	<u>41651</u>	NA	NA	NA			
8247 Quetico Drive, Indianapolis, IN										
1	06/07/07	NA	NA	NA	NA	BDL	NA			
2	06/07/07	NA	NA	NA	NA	BDL	NA			
3	06/07/07	BDL	BDL	76	BDL	NA	N	A		

Notes:

Exceeds IDEM RISC TPH Residential Soil Non-Default Closure Levels (Migration to Groundwater) - most stringent Exceeds IDEM RISC TPH Industrial Soil Non-Default Closure Levels (Migration to Groundwater) - most stringent

"--" - not available

mg - milligram GRO - gasoline range organic

 $\begin{array}{ll} mg/kg - millgram \ per \ kilogram \\ \mu g/kg - microgram \ per \ kilogram \\ BDL - below \ detection \ limit \\ \end{array} \begin{array}{ll} ID - identification \\ NA - not \ analyzed \\ NL - not \ listed \\ \end{array}$

BTEX - bezene, toluene, ethylbenzene, xylene PCE - tetrachloroethane

ERO - extended range organic TPH - total petroleum hydrocarbon

APPENDIX A PHOTOGRAPHIC DOCUMENTATION



Photograph No.: 1 Date: 9/1/10

Direction: Northwest **Photographer:** Marcus Muccianti

Subject: Oil Storage Tank (designated "A" on Figure 2-1)



Site: ESI Environmental, Inc. Site Assessment

Photograph No.: 2 Date: 9/1/10

Direction: Southwest **Photographer:** Marcus Muccianti

Subject: Secondary Containment for Oil Storage Tank (designated "A" on Figure 2-1)



Photograph No.: 3 Date: 9/1/10

Direction: North **Photographer:** Marcus Muccianti

Subject: Unloading Building (designated "II" on Figure 2-1)



Site: ESI Environmental, Inc. Site Assessment

Photograph No.: 4 Date: 9/1/10

Direction: Northwest **Photographer:** Marcus Muccianti

Subject: Primary Separator (designated "D" on Figure 2-1)



Photograph No.: 5 Date: 9/1/10

Direction: Northwest **Photographer:** Marcus Muccianti

Subject: Off Spec Oil Storage Frac Tanks (designated "F" on Figure 2-1)



Site: ESI Environmental, Inc. Site Assessment

Photograph No.: 6 Date: 9/1/10

Direction: Northeast Photographer: Marcus Muccianti

Subject: Auxiliary Separator (designated "G" on Figure 2-1)



Photograph No.: 7 **Date:** 9/1/10

Direction: North **Photographer:** Marcus Muccianti **Subject:** Wastewater Containment Area (located between designations "J" and "I" on Figure 2-

1)



Site: ESI Environmental, Inc. Site Assessment

Photograph No.: 8 Date: 9/1/10

Direction: Southwest **Photographer:** Marcus Muccianti **Subject:** API Oil Water Separator (designated "Q" on Figure 2-1) with Large Air Stripper

(designated "KK" on Figure 2-1) beyond



Photograph No.: 9 Date: 9/1/10

Direction: Southeast **Photographer:** Marcus Muccianti

Subject: Dehydration Building (designated "NN" on Figure 2-1)



Site: ESI Environmental, Inc. Site Assessment

Photograph No.: 10 Date: 9/1/10

Direction: East **Photographer:** Marcus Muccianti

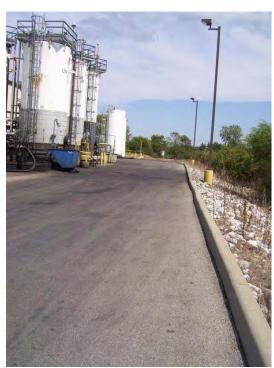
Subject: Off Spec Oil Storage Tanks (designated "GG" on Figure 2-1)



Photograph No.: 11 Date: 9/1/10

Direction: Southeast **Photographer:** Marcus Muccianti

Subject: API Oil Water Separator (designated "Q" on Figure 2-1)



Site: ESI Environmental, Inc. Site Assessment

Photograph No.: 12 Date: 9/1/10

Direction: East **Photographer:** Marcus Muccianti **Subject:** Oil Storage Tanks (designated "BB" on Figure 2-1) with Off Spec Oil Storage Tanks

(designated "GG" on Figure 2-1) beyond